

April 7, 2006

Mr. Bill Brattain
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive #200
Rancho Cordova, CA 95670

www.bbrattain@waterboards.ca.gov

SUBJECT: Comments On The Draft General Waste Discharge Requirements For Dischargers of Green Waste For Composting Within the Central Valley Region

Dear Mr. Brattain:

The City of San Jose (City) would like to thank you for the opportunity to submit comments on the draft *General Waste Discharge Requirements for Dischargers of Green Waste for Composting Within the Central Valley Region*. San Jose was the first large city of over 500,000 to reach the state's 50% diversion mandate. The City could not have met this ambitious goal without the green waste collection and composting program that collects more green waste than all other recyclable materials combined. Started in 1991, the green waste curbside program now collects over 130,000 tons of green material each year from 200,000 single-family homes, 3,500 Multi family complexes, and nearly 100 civic facilities such as parks and community centers. The clean green material is taken to one of two large scale composting facilities where it is made into compost for use in agricultural areas, urban landscaping, City facilities and other beneficial soil uses.

The City understands the administrative need for the waste discharge order and supports the need to control urban runoff and protect ground water sources. However, controls in the draft order appear more stringent and the implementation schedule more aggressive than has yet been proven necessary.

The following are a few examples of requirements that we believe need further discussion:

- Data used to support the waste discharge requirements (WDR)
- Pad liner specifications
- Runoff and wash water control systems or basins designed for 100-year annual return wet season

- Compliance deadline of October 2007

The City is concerned that these aggressive requirements and timeline will not be attainable by many operations, potentially leading to their closure. Costs involved with retooling these operations to meet the proposed requirements would be passed on to customers and require contract renegotiations, all of which will adversely impact very limited municipal resources.

The City of San Jose strongly urges the Water Board staff to hold a meeting prior to issuing the tentative order to discuss comments received and utilize expertise in this field to help resolve identified problems. The City of San Jose is interested in participating as a stakeholder in this process. We appreciate all of Water Board staff's efforts to address our comments and concerns. If you have any questions please contact Michele Young at 408-975-2519.

Sincerely,



John Stufflebean
Director